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DOUGLAS MARLAND, COSETTE	:	
RINAB, and ALEC CHAMBERS,	:	Civil Action No. _____
	:	
Plaintiffs,	:	Assigned to the Honorable _____
	:	
-against-	:	Oral Argument Requested
	:	
DONALD J. TRUMP, in his official	:	
capacity as President of the United States;	:	
WILBUR L. ROSS, JR., in his official	:	
capacity as Secretary of Commerce; and	:	
U.S. DEPARTMENT OF COMMERCE,	:	
	:	
Defendants.	:	
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I, Douglas Marland, declare:

1. I am a plaintiff in this case. I have personal knowledge of and am competent to testify to the facts in this declaration.

2. I grew up in Yardley, Pennsylvania, where I still live. I began creating content when I was in high school, using the application Vine. But I stopped using Vine in 2017, when Vine's owner, twitter, closed the application. I did not try to monetize my content on Vine.

3. After I graduated high school, I attended community college and then enrolled online at the University of Arizona in the fall of 2018.

4. A few months after I began attending classes, I joined TikTok. I was drawn to TikTok because it was a new application and because I enjoy creating content.

5. I quickly realized that TikTok has a reach unlike any other platform. By "reach," I mean that TikTok is designed in a way that allows content creators to be "found" by new audiences, even if a particular creator is not well known. I generally use TikTok to post comedic and parodic videos I have created. One of the first few videos I posted on TikTok was a comedy skit involving my girlfriend and me. That video went "viral," and about 100,000 people "liked" it on TikTok. Within a few days or weeks of that, another video—this one showing me dancing and singing—also went viral, getting about 100,000 likes. Soon, I had thousands of people following my video feed.

6. In July 2019, I earned my first money from content creation. A record label, 300 Entertainment, contacted me after seeing my videos on TikTok and offered to pay me to feature songs of artists represented by the label in my videos. At the time, I would earn about \$100 for each song I used in a video. Today, I earn \$400 or \$500 for using a song in a video.

7. Soon, other artists began reaching out, as well as other companies, including, for example, the Empire Records record label. TikTok also connected me with brands. For example, I participated in an advertising campaign on TikTok for the Snickers brand. I have also worked with dating apps and Gas Media Group, a company that compiles TikTok videos and monetizes them by posting them on YouTube, Google's video-sharing platform.

8. I became so successful on TikTok that I stopped attending classes and stopped working as a waiter. Today, I have about 2.7 million followers of my video feed, and I earn approximately \$5,000 to \$7,000 per month on TikTok. That money is my sole source of income. I use it to pay all my living expenses, including rent and food.

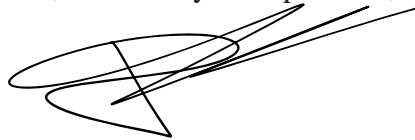
9. Since President Trump issued the executive order that we are challenging, I have seen a drop in my business. For example, 300 Entertainment has told me that if they hire me, they will not pay me the usual amount because there is uncertainty whether TikTok will be shut down. Without TikTok, I would be broke, and I would need to find another way to make a living.

10. There is no platform that would give me the opportunities TikTok has. The closest platform with similar features is Reels, owned by Instagram. But Reels is not a substitute for TikTok. Reels videos are limited to 15 seconds, while I can post videos up to 60 seconds on TikTok. The audience on Reels is different, and every user has to access Reels through an account with Instagram, making the process more time-consuming and less focused on discovering new content. In addition, TikTok uses an algorithm to create a page called "For you" designed to show viewers content that they will like. This makes it possible for little-known creators to show their content to a large audience.

11. One day, I hope to use my experiences and success on TikTok to continue my career in entertainment, whether by acting or by producing a podcast. Without TikTok, it would be very difficult for me to find those opportunities.

I declare under penalty of perjury that the foregoing is true and correct.

Signed at Yardley, Pennsylvania, this 18 day of September, 2020.

A handwritten signature in black ink, appearing to read 'Douglas Marland', written over a horizontal line.

Douglas Marland